

United States District Court
For The Northern District of New York

PLAINTIFF'S EXHIBIT LIST

CASE TITLE: KARAM v. COUNTY OF RENSSELAER, NEW YORK et al

CIVIL ACTION NO.: 1:13-CV-1018

ASSIGNED JUDGE: Hon. Mae A. D'Agostino

(Plaintiff) (Defendant) (Court)

Exhibit No.	Marked for Identification	Admitted Into Evidence	Remarks	Witness	Exhibit Description
1					Certified medical records of the Plaintiff as generated by Dr. Ovens
2					Certified medical records of the Plaintiff as generated by Capital Care Family Medicine
3					Certified medical records of the Plaintiff as generated by Karner Psychological Associates
4(a-e)					Audio recordings of conversations between Plaintiff and (1) Defendant Mahar; (2) Patrick Russo; (3) Marcelle Swanberry; (4) Thomas Hendry; (5) Linda Baldwin as produced to Defendants by Plaintiff in discovery.

Exhibit No.	Marked for Identification	Admitted Into Evidence	Remarks	Witness	Exhibit Description
5					The file of “notes, records and the like” regarding Plaintiff’s investigations of HIPAA violations by employees of Rensselaer County Sheriff’s Department.
6					“Taliban Video” with e-mail from Patrick Russo (Mar. 5, 2010), Subj “FW: What the Taliban do when they aren’t killing people”
7					Photograph of Arab Headdress given to Plaintiff by Patrick Russo (marked as Exhibit 4 at Plaintiff’s deposition (Feb. 26, 2015))
8					Photo of burnt-out car with sign “Lt. Karam’s Undercover Unit”
9					Time Sheet of Plaintiff, referencing “Dept: Rat Squad”
10					Jun. 19, 2012 Ltr. from Defendant Mahar to Eric Farrell, Northeast Health
11					Aug. 6, 2012 E-mails between Plaintiff and Michael Deyo
12					Sept. 19 and 20, 2012 E-mails between Plaintiff and Michael Deyo
13					Aug. 29, 2012 “Time & Attendance Review” document from Harold Smith to Plaintiff
14					Aug. 29, 2012 “Oral Warning Record” from Harold Smith to

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					Plaintiff
15					Note of CapitalCare Medical Group LLC (Sept. 4, 2012) "Out of Work"
16					Oct. 31, 2012 "Employee Injury/Illness Due Process Review Application" of Plaintiff with attachments
17					Nov. 30, 2012 Grievance Form, United Public Service Employees Union (UPSEU) "UPSEU Alert" - "UPSEU's Grievance Pressures Sheriff to award disability and backpay"
18					Sept. 16, 2013 Letter from UPSEU President to Kathleen Jimino
19					"Leave Bank Proposal" signed Mar. 11, 2003 by County of Rensselaer and UPSEU
20					Jan. 7, 2013 Demand for Arbitration by UPSEU with attachments, including sick leave donation sheets
21					Feb. 26, 2013 Letter, postal receipt, and Notice of Claim from Plaintiff's attorney to Steven Pechenik, Esq.
22					Feb. 28, 2013 Letter from Defendant Mahar to Plaintiff
23					May 3, 2013 Letter to Brian Goldberger, Esq. from Russell

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					Denea (May 3, 2013) with enclosed report
24					Jun. 5, 2013 Letter from A.J. Bosman, Esq. to Steven Pechenik, Esq. with fax confirmation
25					Aug. 26, 2013 "Position Statement" submitted by the County of Rensselaer to the Equal Employment Opportunity Commission
26					Aug. 20, 2013 Complaint filed in U.S. District Court for the Northern District of New York with affidavits reflecting service of same on Defendants County of Rensselaer and Mahar
27					Sept. 13, 2013 Letter from Defendant Mahar to Plaintiff
28(a-e)					Audio recordings of conversations between Plaintiff James Karam and (1) Ruth Vibert; (2) Greg Brown; (3) Steven Pechenik, Esq.; (4) Harold Smith; and (5) Richard Crist.
29					Discovery documents recently provided to Plaintiff James Karam in connection with the <i>Hancock v. County of Rensselaer, et al.</i> and <i>Vibert v. County of Rensselaer, et al.</i> cases.
30					Memorandum from Defendant

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31					Mahar (Feb. 1, 2006) Forwarded E-mail from Harold Smith (Jun. 17, 2003)
32					E-mails between Plaintiff James Karam and Ruth Vibert (May 8, 2012)
33					Fax Cover Sheet from Coxsackie Police Department (Jan. 2, 2013) List of 207-c applications as produced by Defendants in discovery
34					Gregory Brown 207-c application and approval documents (May 2012)
35					Mar. 6, 2015 Letter from Defense Counsel to A.J. Bosman, Esq.

1. Plaintiff reserves the right to supplement this Exhibit List with additional exhibits as needed and depending on the evidence introduced at trial. The Plaintiff reserves the right to add or delete exhibits.

2. This Exhibit List may not include rebuttal or impeachment exhibits.

3. Plaintiff reserves the right to seek admission of all or some of these exhibits depending on the court's rulings and the evidence introduced at the impending trial.

Dated: May 16, 2016
Rome, NY

s/ A.J. Bosman

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